

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE OBJECTIONS TO
DAVID POPKIN INTERROGATORIES
(DBP/USPS-34, 35 AND 40)
(February 21, 2012)**

The United States Postal Service files these objections to the above-identified interrogatories of David Popkin filed on February 9, 2012. The text of each interrogatory is followed by a statement of the Postal Service's objections. The first objection below applies to both DBP/USPS-34 and 35. The second objection applies to DBP/USPS-40.

DBP/USPS-34 The following Interrogatory refers to the Statement of Work for the TTMS/EXFC dated December 26, 2008, as provided in response to my Interrogatory DBP/USPS-21.

- [a] The third sentence of the first paragraph in Section 2.2.3.3 on Page 9 allows the dropper to induct mail prior to the induction date if the CPMS listing shows a last pickup time which is later than the last pickup time shown on the label on the blue collection box. Please provide an example of what this sentence means by giving the scenario that would take place indicating the time that might appear on the collection box and the time that might appear on the CPMS listing and using days of the week assuming that no holidays are involved.
- [b] The final sentence of the same paragraph indicates that the supplier may change the induction date under this scenario to the next date. Please incorporate the conditions under which this would take place using the days of the week and the conditions requested in subpart [a] above.
- [c] Section 2.2.5.1.2 on Page 12 seems to be identical to the above referenced section. Please confirm or explain.
- [d] What information and/or restrictions are provided to the dropper as to the location of the collection point and time window that may be utilized for a given mailing. Please indicate the source of the data and confirm or explain that the data appearing on the blue collection box label will not be known until the dropper arrives at the box.
- [e] Assume that the CPMS shows a final weekday collection time of 3 PM and the label on the blue collection box shows a final weekday collection time of 2 PM.

What action will be taken by the dropper and subsequently by the supplier if the dropper arrives at the collection point on Wednesday at the following times:

[1] 1 PM [2] 2:10 PM

- [f] Assume that the CPMS shows a final weekday collection time of 2 PM and the label on the blue collection box shows a final weekday collection time of 3 PM. What action will be taken by the dropper and subsequently by the supplier if the dropper arrives at the collection point on Wednesday at the following times:

[1] 1 PM [2] 2:10 PM

- [g] Please confirm or explain that a number of the collection points are scheduled for more than one collection time on a given day. What are the guidelines, if any, that exist in utilizing a collection point that has multiple collection times or can the dropper choose any drop time between 5 AM and 30 minutes prior to the final collection time?

- [h] Please confirm or explain that a number of the collection points are scheduled for a weekday final collection time of later than 6:30 PM and that these boxes should also have a collection time shortly after 5 PM [POM Section 322.341]. What are the guidelines, if any, that exist in utilizing a collection point that has a weekday collection time of 6:30 PM or later?

- [i] If the response to subparts [g] and/or [h] above indicate that there are no guidelines for either or both of these two scenarios, please confirm or explain that the on-time results would be skewed in favor of the Postal Service in subpart [g] since there would be two or more opportunities to collect the mail and skewed against the Postal Service in subpart [h] since the mail would arrive at the plant later than with a 5 PM or earlier collection.

- [j] Please advise the guidelines, if any, that exist to take into account each of the following characteristics to ensure that the results are representative of the conditions that exist in the overall mail profile:

[1] Early collection times vs. late collection times

[2] Early arrival time at the plant vs. late arrival time at the plant

[3] Multiple collection times vs. a single collection time

[4] Using an early vs. late collection at a box with multiple collections

DBP/USPS-35

- [a] Please advise the approximate number of EXFC droppers and reporters that are presently being utilized.

- [b] For reporters, what is the approximate percentage breakdown between those that receive mail delivery at a post office box vs. those that receive delivery at a residence address vs. delivery at a business address?

Both DBP/USPS-34 and 35 seek minute details regarding the operation of the External First-Class Mail (EXFC) measurement system used to generate service performance data for single-piece First-Class Mail. The information requested by the

various subparts of each interrogatory is not relevant to the issues raised by the request in the instant docket. Instead, the mechanics of service performance measurement are a matter currently within the scope of a parallel docket, ACR2011-1. The operation of the EXFC measurement system is an issue relevant to the Commission's assessment of service performance as part of its Annual Compliance Determination under section 3653. ACR dockets have specialized rules for the provision of relevant postal data by the Postal Service and the manner in which parties can ask the Presiding Officer to consider the issuance of information requests. The fact that intervenors cannot directly submit interrogatories to the Postal Service regarding the mechanics of the EXFC system in an ACR docket does not entitle those parties to use the discovery process in a parallel section 3661 service change docket as a convenient work-around. The proponent of these interrogatories failed to pursue the limited opportunities in ACR2011 to request that the Commission propound these questions to the Postal Service; the failure to pursue that opportunity can in no sense serve as the foundation for pursuing such questions in this docket.

DBP/USPS-40

Please refer to your response to Interrogatory DBP/USPS-30.

- [a] Prior to the consolidation of BMEUs to 40 locations in New Jersey, approximately how many locations in New Jersey permitted the entry of the various categories of bulk mail?
- [b] Prior to the consolidation of BMEUs to 1000 locations in the other 49 states, approximately how many locations in these 49 states permitted the entry of the various categories of bulk mail?
- [c] Which ever list is shorter, please advise which of the 49 other states either experienced a consolidation of BMEUs or did not experience a consolidation of BMEUs and still permit the deposit of such mail at all facilities in the state?
- [d] Over what time frame did these consolidations take place?

This interrogatory seeks information that has no relevance to any material issue raised by the Request in Docket No. N2012-1. The Postal Service should not be burdened with the task of dredging up every bit of national or home state operational minutiae for the benefit of intervenors inclined to use the discovery process to explore every bright and shiny bauble of historical postal trivia. If the service changes under review in this docket result in a diminution in the current baseline number of Bulk Mail Entry Units (nationwide or in the state of New Jersey), the fact that there used to be more BMEUs at some point in the past sheds no light on the question of whether the change from the current baseline to the future number of BMEUs would be consistent with the provision of service consistent with the policies of title 39. Accordingly, the Postal Service should not be burdened with historical research of the sort requested by this interrogatory.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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